

**DOCUMENTS NEEDED FOR A COL APPLICATION
THAT REFERENCES AN ESP APPLICATION**

Section	Subsection	Reference
TRANSMITTAL LETTER	CONTENTS - Request for license - Oath and Affirmation	10 CFR § 52.75, § 50.30(b)
APPLICATION	GENERAL INFORMATION - Institutional Information - Financial Qualifications	10 CFR § 52.77, § 50.33,
APPENDIX A	ANTITRUST INFORMATION (To be submitted 9 months prior to the COL application)	10 CFR § 52.77, § 50.33a, Part 50 App. L
APPENDIX B	FINAL SAFETY ANALYSIS REPORT	10 CFR § 52.79, § 50.34(b)
APPENDIX C	EMERGENCY PLAN (By reference as applicable to the ESP emergency plan)	10 CFR § 52.77, § 50.33(g), § 50.47
APPENDIX D	FIRE PROTECTION PLAN - Fire hazards Analysis	10 CFR § 50.48(a), Appendix R.II to 10 CFR Part 50, RG 1.70 Section 9.5.1
APPENDIX E	SECURITY PLAN	10 CFR § 52.79, § 50.34(c), 10 CFR Parts 11 & 73, Appendix C
APPENDIX F	SAFEGUARDS CONTINGENCY PLAN	10 CFR § 52.79, § 50.34(d), 10 CFR Part 73
APPENDIX G	DESIGN-SPECIFIC PROBABILISTIC RISK ASSESSMENT	10 CFR § 52.79(b), § 52.47(a)(1)(v)
APPENDIX H	ENVIRONMENTAL REPORT (By reference as applicable to the ESP environmental report or EIS)	10 CFR § 52.79, § 52.89, § 50.30(f), § 51.45, § 51.50
APPENDIX I	ITAAC	10 CFR § 52.79(c)
APPENDIX J	TECHNICAL SPECIFICATION	10 CFR § 52.79, § 50.34(b)(6)(vi), § 50.36
APPENDIX K	EXEMPTION REQUESTS (As necessary)	10 CFR § 50.12
APPENDIX L	REQUEST FOR WITHHOLDING OF TRADE SECRETS, AND COMMERCIAL OR FINANCIAL INFORMATION (As necessary)	10 CFR § 2.790

Pebble Bed Modular Reactor Pre-application Meeting

Application Content Meeting
September 5, 2001



Form and Content

Safety Analysis Report (SAR)

- SAR must be a complete, high quality, final document
- Hard copies and electronic copies are acceptable
- Document word processing software (e.g., Wordperfect, Word)
- Following RG 1.70 is not required for an application
- 10 CFR 50.34(g) address latest version of SRP

Form and Content

Safety Analysis Report

- Inform the staff of:
 - ▶ Design changes that were influenced by Probabilistic Risk Assessment
 - ▶ Cross reference providing reason for certain design features:
 - PRA
 - Agency Generic Safety Issues: USI/GSIs
 - Severe accident issue resolution
 - Commission technical and policy issue papers
 - Generic Letters and Bulletins

Quality of Applications

Safety Analysis Report

- A complete, high quality, final document
- Complete system descriptions for all systems for the entire plant, non-safety related and safety related, described in SAR
- Design complete
- Necessary testing complete
- Referenced material must be submitted along with SAR
- Metrication

Quality of Applications (cont.)

Proprietary Information

- Proprietary and non-proprietary version must be submitted together
- Applicant must be judicious in dispositioning proprietary information

Quality of Applications (cont.)

Requests for Additional Information (RAI)

- All RAIs will be tracked in a tracking system
- RAIs should be used to support safety evaluation development
- Drafting of SER will begin with initial review
- Responses to RAI will be submitted as they are developed within final date of submittal

Quality of Applications (cont.)

Requests for Additional Information (cont.)

- RAI response is not considered complete until the entire RAI response is submitted
- Applicant's failure to provide quality response on schedule could cause rescheduling of entire review

Quality of Applications (cont.)

Changes to SAR

- After initial submittal, no information will be removed or changed from SAR unless agreed upon with staff reviewer prior to change
- Document control system is beneficial for consistent changes throughout SAR

Quality of Applications (cont.)

Changes to SAR (cont.)

- The text should be revised by replacing pages. The changed or revised portion of each page should be highlighted by a "change indicator" mark consisting of a bold vertical line drawn in the margin opposite the binding margin. The line should be of the same length as the portion changed.

Quality of Applications (cont.)

Changes to SAR (cont.)

- All pages submitted to update, revise, or add pages to the report should show the date of the change and the change or amendment number. A guide page listing the pages to be inserted and the pages to be removed should accompany the revised pages. When major changes or additions are made, a revised table of contents should be provided.

Application Review Process

Schedule and Milestones

- Notice of intent for ESP or COL should be provided 12 months prior to application
- Introduction meeting to describe whole design to review staff
- Review schedule will be determined after acceptance review is complete

Application Review Process (cont.)

Schedule and Milestones (cont.)

- At least day-for-day slip if schedules are not met
- Significant slips in schedule could result in lost window of opportunity resulting in larger schedule slippage
- Project managers are the agency points of contact

Application Review Process (cont.)

Example of license renewal/casks review milestones

- Two rounds for RAIs
- Clarification/Understanding of both the RAIs and proposed responses in either a telecon or meeting may be beneficial
- Draft SER will be issued on schedule with open issues if necessary depending of applicant's response to RAIs

Application Review Process (cont.)

Meetings

- Meeting notices with agenda must be issued 2 weeks prior to the meeting
- All meetings are open to the public except when proprietary information is discussed
- Requests for a closed meeting due to proprietary information, any proprietary information (with affidavit and non-prop version) must be submitted in advance of the meeting with adequate time for staff review
- Technical meetings typically held at NRC

Headquarters

Early Site Permits

- Regional meeting with applicant to discuss Quality Assurance (12 months prior)
- Staff meeting with applicant to discuss expectations with submittal (12 months prior)
- Public meeting in area of site (9-12 months prior)
- Staff tour of site

Early Site Permits (cont.)

Meetings

- All meetings are open to the public except when proprietary information is discussed
- Staff will inform applicant of questions to be discussed at meetings

Early Site Permits (cont.)

Meetings (cont.)

- Inspections made of site characteristics activities, Quality assurance implementation, document configuration control at site, company headquarters, and testing facilities
- Advisory Committee on Reactor Safeguards (ACRS) meetings
 - ▶ Applicant to present technical information on design
 - ▶ Staff presents process issues and positions on issues

Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)



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Presentation to Exelon September 5, 2001**

ITAAC

- ▶ Program for verifying that the facility has been constructed and will be operated in conformity with the license, the provisions of Atomic Energy Act, and the Commission's rules and regulations.
- ▶ ITAAC must meet 10 CFR 52.79(c) and 52.97(b)
- ▶ ITAAC exist for the certified portion of the ABWR, System 80+, and AP600 standard plant designs
- ▶ ITAAC for these plants organized according to structures, systems, and components (SSC)

ITAAC

- ▶ SSC approach results in ITAAC being verified late in construction phase
- ▶ Recognized in SECY-94-294 "Construction Inspection and ITAAC Verification"

